WASHINGTON STATE DEPARTMENT OF ECOLOGY
CENTRAL REGIONAL OFFICE
15 W YAKIMA AVE, SUITE 200
YAKIMA, WASHINGTON 98902

STATEMENT OF BASIS
FOR
FINAL AIR OPERATING PERMIT NO. 04AQ-C007 FIRST REVISION
GREATER WENATCHEE REGIONAL LANDFILL AND RECYCLING CENTER
DOUGLAS COUNTY, WASHINGTON

PREPARED BY
THE WASHINGTON STATE DEPARTMENT OF ECOLOGY
CENTRAL REGIONAL AIR QUALITY SECTION
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April 13, 2006

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1.0 LIST OF ABBREVIATIONS

AOP	Air Operating Permit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO_2	Carbon Dioxide
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
GWRLRC	Greater Wenatchee Regional Landfill and Recycling Center
lb	pound
LFG	Landfill Gas
m^3	Cubic meters
Mg	Megagram
M_{NMOC}	NMOC Mass Emission Rate
MSW	Municipal Solid Waste
NMOC	Non Methane Organic Compound
NOC	Notice of Construction
NO_X	Oxides of Nitrogen
NSPS	New Source Performance Standard
PM_{10}	Particulate Matter with an Aerodynamic Diameter of 10 micrometers or less
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
SO_2	Sulfur Dioxide
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yd^3	Cubic yard
yr	Year

2.0 GENERAL INFORMATION

Company Name:	Waste Management Disposal Services of Washington, Inc.
Source Name:	Greater Wenatchee Regional Landfill and Recycling Center
Owner:	Waste Management Disposal Services of Washington, Inc.
Parent Company:	Waste Management of North America, Inc.
Unified Business Identification Number:	601289041
Standard Industrial Classification Code:	4953
Mailing Address:	Greater Wenatchee Regional Landfill PO Box 2963 Wenatchee, WA 98807
Source Address:	191 South Webb Road East Wenatchee, WA 98802
Responsible Official:	Ted Woodard District Manager Greater Wenatchee Regional Landfill and Recycling Center 191 Webb Road East Wenatchee, WA 98802 Phone: 509-884-2802 Cell/24-hr phone: 509-860-3335 Fax: 509-884-3724
Source Contact:	Marin Anthis Greater Wenatchee Regional Landfill and Recycling Center 191 Webb Road East Wenatchee, WA 98802 Phone: 509-884-2802 Cell: 509-860-3260 Fax: 509-884-3724

3.0 BACKGROUND

3.1 INTRODUCTION

This document sets forth the legal and factual basis for the permit conditions in an AOP issued by the State of Washington Department of Ecology for a solid waste landfill located in East Wenatchee, Washington. This document is called a "statement of basis" and is required by Washington State regulations [Chapter 173-401 WAC]. A statement of basis does not contain enforceable permit conditions. Enforceable permit conditions are contained in the AOP itself.

Basis for Title V Applicability:

GWRLRC is subject to Title V, Air Operating Permit Regulation, by virtue of being subject to the 40 CFR, Part 60, Subpart WWW, (NSPS). The NSPS states that MSW landfills with a design capacity greater than or equal to 2.5 million megagrams or 2.5 million cubic meters are subject to part 70 (Title V) permitting requirements. GWRLRC reports that their design capacity is 3.8 million cubic meters.

Attainment Classification:

GWRLRC is located in an area which is in attainment or unclassified for all criteria pollutants.

Timeline

March 11,2003 – Ecology received GWRL's AOP renewal application
March 19,2003 – Ecology deemed AOP renewal application incomplete
March 29, 2003; March 31,2003; April 1, 2003 – Ecology received additional AOP renewal application materials
April 1, 2003 – Ecology deemed AOP renewal application complete
November 13, 2003 – Ecology issued Draft AOP renewal
December 26, 2003 – comment period on Draft AOP renewal ended
January 16, 2004 – Ecology issued Proposed AOP renewal
February 24, 2004 – Ecology received update of GWRL responsible official
February 26, 2004 – Ecology received notification from EPA that, "the permit is now eligible for issuance"
March 8, 2004 – Ecology issued Final AOP No. 04AQ-C007
December 14, 2004, February 24, 2005, and May 20, 2005 – Ecology received information requesting to revise NOC Order No. 00AQCR-1000, and integrate it with the resulting significant modification of the AOP
January 13, 2006 – Ecology issued Draft AOP 1st Revision
February 27, 2006 – comment period on Draft AOP 1st Revision ended – no comments received
March 13, 2006 – Ecology issued Proposed AOP 1st Revision
April 10, 2006 – Ecology received notification from EPA that, "[t]he modification to the permit is now eligible for issuance"

4.0 SOURCE DESCRIPTION

4.1 PHYSICAL DESCRIPTION

GWRLRC is a 69-acre municipal solid waste landfill with 110 acres of buffer. It began operation in the late-1960s and is expected to continue operation through 2014. The landfill's maximum design capacity is 3,793,400 m^3 (4,961,580 yd^3) with a maximum waste acceptance rate of 92,950 tons/yr. The landfill is located in an arid climate that typically receives an average of 8.6 inches of precipitation per year. Those lands surrounding the landfill are predominately used for agriculture. There are some residences nearby. A site map is included as Figure 1.

4.2 DESCRIPTION OF PROCESSES

MSW is accepted primarily from Douglas, Kittitas, and Chelan counties for disposal. Besides MSW, the landfill also accepts asbestos, construction demolition and landclearing debris, industrial non-hazardous wastes, petroleum contaminated soil, sewage sludge, and wood wastes. GWRLRC is prohibited from accepting hazardous wastes. Waste is delivered to the landfill using waste collection vehicles, including front loaders, rear loaders, and roll-off trucks. The source is not currently open to the public. The general public is directed to the South Wenatchee Transfer Station where a recycling area is provided. The recycling area includes drop boxes and containers for recycled aluminum, cardboard, newspapers and glass. The landfill generally operates Monday through Saturday, 5:00 a.m. to 5:00 p.m..

Process #1, Source-Wide

Process #1 includes source-wide emissions originating from site operations which include; excavation, soil stockpiling, construction of lined disposal cells, and the associated leachate collection systems. Emissions include fugitive dust from motor vehicle operation, and emissions related to source-wide support services such as storage tanks, maintenance, housekeeping, and miscellaneous, insignificant emissions activities. Process #1 emission limits, work practice standards and permit conditions also apply to all significant emission units located at the source. The source's estimated potential emissions are listed in Table 1.

Process #2, Solid Waste Landfill

The current site of the landfill was opened in 1962 and was operated as an open burning dump until 1970. It is estimated that during that period up to 25 tons per day were burned in the West Trench. Demolition debris continued to be burned in the west trench through 1972. Then up to 100 tons per day of primarily residential and agricultural waste were deposited through 1978, and septage and sewage sludge was accepted at the site from approximately 1979 through 1990. During this time, sludge was placed in lined and unlined ponds, landfarmed, and commingled with the MSW. Present day MSW disposal averages 1000–1200 cubic yards per day, but, the site

could potentially handle between 2000 and 2400 cubic yards per day with existing equipment and personnel. The rate of waste acceptance varies seasonally, with lower volume in the winter and higher volume in the summer. Waste is placed in cells, compacted, and covered on a daily basis. Waste is compacted in thin layers with an assumed compaction density of 1,100 to 1,300 lbs/yd^3. Ecology has approved use of an alternate daily cover to be used at the landfill. Trench 1 and the northeast half of the North Berm were closed and capped during the summer of 2000. The primary source of MSW landfill emissions is landfill gas, generated by biodegradation, of which the main components are methane, NMOC, and CO_2. The volume of LFG which is generated within the landfill is minimized by controlling the amount of liquid which is introduced into the landfill, thereby retarding the decomposition process. As of May 1998, the source's Tier 2 non-methane organic compound emission rate was 21 Mg per year (23 tons per year). In addition, as areas of the landfill are completed, gas vents are installed to relieve the pressure, and thus, the migratory potential of the gas is decreased. Routine monitoring for the LFG is conducted on a quarterly basis to ensure that the gas is not migrating away from the landfill.

Process #3, Landfill Gas Flare
Landfill gas is collected with an active collection system. The collection system is currently routed to a single enclosed flare. Additional flare(s) may be installed up to a total flare capacity of 2000 standard cubic feet per minute. The current flare's initial performance test occurred August 22, 2003. Test results reported a NMOC destruction efficiency of 99.8 percent.

5.0 NEW SOURCE REVIEW HISTORY

In Washington State, new sources of air pollutant are potentially subject to four types of new source review (air quality permitting). Federal new source review includes Prevention of Significant Deterioration (Title 40 Code of Federal Regulations Part 52.21) and Nonattainment New Source Review (Title 40 Code of Federal Regulations Part 52.24). These Federal programs apply to large sources with potential emissions equal or greater than specified thresholds. Additionally, State new source review, referred to as Notice of Construction permitting, applies to smaller sources and the lesser emissions at the larger sources. Notice of Construction permitting may be required for criteria pollutants (WAC 173-400-110) and/or toxic air pollutants (WAC 173-460-030).

5.1 MUNICIPAL SOLID WASTE LANDFILL

The establishment of this landfill predates new source review requirements.

5.2 TRENCH 1 & NORTH BERM

Trench 1 and the northeast half of the North Berm were capped during the summer 2000. Closure of these cells was permitted under Notice of Construction Order No. 00AQCR-1000, issued April 21, 2000. Initially, a passive landfill gas collection system and eleven open flares were approved. Passive landfill gas collection wells and fourteen open flares were installed. Partially due to the discrepancy between the approved and installed systems, Greater Wenatchee Regional Landfill requested that the Order be revised.

On January 29, 2003, Notice of Construction Order No. 00AQCR-1000 First Revision was issued. The revised Order mandated installation and use of an active landfill gas collection system and a single enclosed flare. Additionally, the revised Order deleted previously required landfill gas monitoring probe requirements.

On January 13, 2006, Proposed Decision regarding Notice of Construction Order No. 00AQCR-1000 Second Revision was issued. Ecology proposes to increase the landfill gas flaring capacity, provided that all flaring capacity is achieved through the use of enclosed flares meeting Best Available Control Technology. As this proposed decision addresses facility-wide landfill gas collection and control requirements, the Proposed Decision is no longer specific to the final cover of Trench 1 and the northeast half of North Berm. All requirements apply facility-wide, to the existing landfill.

5.3 FLARE

The existing flare is permitted under Notice of Construction Order No. 00AQCR-1000 First Revision, as briefly described above. Additional flaring capacity in proposed for approval in Proposed Decision regarding Notice of Construction Order No. 00AQCR-1000 Second Revision, issued January 13, 2006.

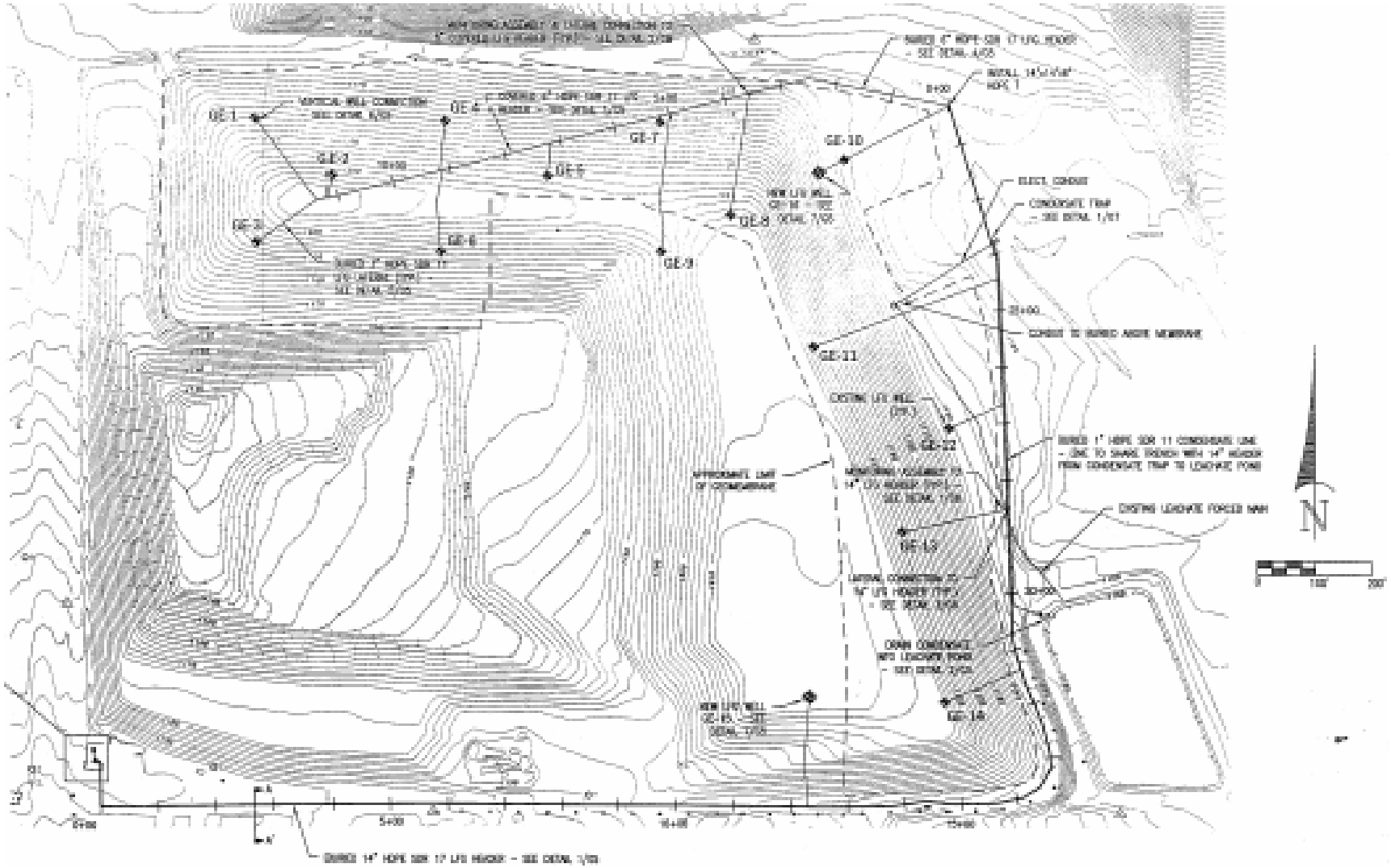

Figure 1. Process flow diagram of Landfill (adapted from GC Environmental, Inc. diagram submitted with March 31, 2003, AOP renewal application).

Table 1. Summary of potential emissions from GWRLRC (adapted from March 31,2003, Title V Operating Permit Renewal Application and NOC Order No. 00AQCR-1000 First Revision).

Pollutant	Units	Landfill Fugitives	Flare(s)	Roads	Evaporation Pond	**TOTAL**
TSP	ton/yr	38.5	4.459	20		**63**
PM_{10}	ton/yr	6.1	4.459	5		**16**
SO_2	ton/yr		2.915			**2.0915**
CO	ton/yr		26.50			**26.50**
NO_X	ton/yr		15.90			**15.90**
NMOC	ton/yr	23.32	0.1749			**24.02**
Acetone	lb/yr	293.1	2.198		4.9	**306.7**
Acrylonitrile [hap]	lb/yr	75.11	0.5644			**77.37**
Benzene [hap]	lb/yr	193.9	1.455		0.70	**200.4**
Butane	lb/yr	110.1	0.8257			**113.4**
Carbon Disulfide [hap]	lb/yr	9.875	0.07406			**10.18**
Carbon Tetrachloride [hap]	lb/yr	0.1377	0.001033			**0.1418**
Carbonyl sulfide [hap]	lb/yr	6.583	0.04937			**6.780**
Chlorobenzene [hap]	lb/yr	6.293	0.04720			**6.482**
Chlorodiflouromethane	lb/yr	19.62	0.1472			**20.21**
Chloroethane [hap]	lb/yr	18.04	0.1353			**18.58**
Chloroform [hap]	lb/yr	801.0	6.008			**825.0**
1,2-Dichlorobenzene [hap]	lb/yr	6.904	0.05178			**7.111**
1,4-Dichlorobenzene [hap]	lb/yr	2.167	0.01625			**2.232**
Dichlorodifluoromethane [hap] **(Freon 12)**	lb/yr	424.5	3.1838			**437.3**
Ethylidene Chloride [hap] **(1,1-Dichloroethane)**	lb/yr	52.00	0.3900		0.99	**54.59**
Vinylidene Chloride [hap] **(1,1-Dichloroethene)**	lb/yr	4.336	0.03252		1.3	**5.8**
Ethylene Dichloride [hap] **(cis-1,2-Dichloroethane)**	lb/yr	9.074	0.06805		0.22	**9.57**
1,2-Dichloroethene	lb/yr	61.57	0.4618			**63.42**
Dichlorodifluoromethane (Freon 12)	lb/yr	60.30	0.4523			**62.11**
Dichlrotetrafluoroethane	lb/yr	11.28	0.08457			**11.62**
Ethanol	lb/yr	280.3	2.103			**288.7**
Ethylbenzene [hap]	lb/yr	109.5	0.8208		0.90	**113.7**
Ethyl Chloride [hap] **(Chloroethane)**	lb/yr				0.36	
Ethylene Dibromide	lb/yr	0.04202	0.0003152			**0.0433**
Ethyl Mercaptan	lb/yr	31.68	0.2376			**32.63**
Hexane [hap]	lb/yr	126.6	0.9495			**130.4**
Hydrogen Sulfide [hap]	lb/yr	270.6	2.030			**278.7**
Mercury [hap]	lb/yr	0.01310	0.03930			**0.05240**
Methyl Chloride [hap]	lb/yr	13.67	0.1025			**14.08**
Methylene Chloride [hap]	lb/yr	271.7	2.038		0.47	**280.3**
Methyl Ethyl Ketone [hap] **(2-Butanone)**	lb/yr	114.4	0.8574		16.4	**134.2**
Methyl isobutyl ketone [hap]	lb/yr	41.89	0.3142		0.49	**43.64**
Methanethiol [hap] **(Methyl Mercaptan)**	lb/yr	26.79	0.2009			**27.59**
Pentane	lb/yr	53.09	0.3982			**54.68**
2-Propanol	lb/yr	673.5	5.051			**693.7**
Propylene Dichloride	lb/yr	4.548	0.03411			**4.685**

Pollutant	Units	Landfill Fugitives	Flare(s)	Roads	Evaporation Pond	**TOTAL**
Styrene [hap]	lb/yr	4.309	0.03232			**4.438**
Tetrachloroethane [hap]	lb/yr	41.67	0.3125			**43.0**
Tetrachloroethylene [hap] **(Tetrachloroethene)**	lb/yr	138.4	1.038		0.11	**142.7**
Toluene [hap]	lb/yr	3400	25.5		2.2	**3505**
1,1,1-Trichloroethane [hap] **(Methylchloroform)**	lb/yr	14.33	0.1075		0.49	**15.3**
Trichloroethylene [hap] **(Trichloroethene)**	lb/yr	82.87	0.6215		0.082	**85.44**
Trichlorofluoromethane (Freon 11)	lb/yr	23.35	0.1752			**24.05**
Trimethyl Benzene	lb/yr	25.95	0.1946			**26.73**
Vinyl Chloride [hap]	lb/yr	102.6	0.7594		0.36	**106.1**
Xylenes [hap]	lb/yr	287.3	2.155		2.4	**298.3**

6.0 AIR OPERATING PERMIT HISTORY

Title V of the 1990 Federal Clean Air Act Amendments required all states to develop a renewable operating permit program for industrial and commercial sources of air pollution. Congress structured the air operating permit system as an administrative tool for applying existing regulations to individual sources. The goal is to enhance accountability and compliance by clarifying in a single document which requirements apply to a given business or industry.

The Washington State Clean Air Act (Chapter 70.94 Revised Code of Washington) was amended in 1991 and 1993 to provide the Department of Ecology and local air agencies with the necessary authority to implement a state-wide operating permit program. The law requires all sources emitting one hundred tons or more per year of a criteria pollutant, or ten tons of a hazardous air pollutant, or twenty-five tons in the cumulative of hazardous air pollutants, to obtain an operating permit. Criteria pollutants include sulfur dioxide, nitrogen oxides, particulate matter, carbon monoxide, and volatile organic compounds.

Ecology authored Chapter 173-401 of the Washington Administrative Code (WAC), which specified the requirements of Washington State's Operating Permit Regulation. This regulation became effective on November 4, 1993. On November 1, 1993, This regulation was submitted to the United States Environmental Protection Agency (EPA), for program approval. On December 9, 1994, EPA granted interim approval of Chapter 173-401 WAC. This interim approval was extended until EPA granted final approval on August 13, 2001. The current version of this regulation was filed on September 16, 2002.

On March 12, 1996, EPA promulgated the Standards of Performance for Municipal Solid Waste Landfills (Subpart WWW). Subpart WWW required the acquisition of Title V permits for subject landfills with a design capacity greater than or equal to 2.5 million megagrams or 2.5 million cubic meters. The permittee submitted a complete application on July 1, 1997. On April 2, 1999, Ecology issued AOP No. DE 99AOP-C122 (valid 4/2/99 thru 5/10/00). The Permit went through an administrative permit amendment, to update the responsible official, resulting in AOP Order No. DE 99AOP-C122, First Revision, issued July 13, 2000 (valid 5/11/00 thru 10/19/01). The Permit went through a reopening for cause, to incorporate NOC Order No. 00AQCR-1000, resulting in AOP Order No. DE 99AOP-C122 Second Revision, issued October 19, 2001 (valid 10/20/01 thru 7/25/02). Finally, the permit went through a combined administrative amendment, to add a second responsible official, and reopening for cause, to incorporate NOC Order No. 00AQCR-1000 First Revision, resulting in AOP Order No. DE 99AOP-C122 Third Revision, issued July 26, 2002 (valid 7/26/02 thru 4/2/04).

7.0 FEDERAL LANDFILL REGULATIONS

7.1 NEW SOURCE PERFORMANCE STANDARD (NSPS)

On March 12, 1996, EPA promulgated the Standards of Performance for Municipal Solid Waste Landfills (Title 40 Code of Federal Regulations Part 60 Subpart WWW). The NSPS applies to each municipal solid waste landfill that commenced construction, reconstruction, or modification, or began accepting waste, on or after May 30, 1991. The NSPS requires landfills with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters to submit Non-Methane Organic Compound (NMOC) emission reports. When the precontrolled NMOC emissions are calculated at or above 50 megragrams per year additional requirements are triggered. Ecology received a copy of the permittee's initial *Design Capacity Report* and *NMOC Report* on June 4, 1996. The initial NMOC emission rate report listed the NMOC emission rate as 67 Mg/yr using the default variable values listed in 40 CFR 60.754(a)(1)(i). Ecology received copies of additional NMOC emission rate reports and their respective NMOC emission rates using measured NMOC concentrations as measured by Tier 2 (40 CFR 60.754(a)(3)). The NMOC emission rates were reported at 16 Mg/yr, 17 Mg/yr, and 21 Mg/yr, on December 4, 1996, June 5, 1997, and May 13, 1998, respectively.

7.2 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP)

On January 16, 2003, EPA promulgated the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills (Title 40 Code of Federal Regulations Part 63 Subpart AAAA). The NESHAP applies to municipal solid waste landfills that have accepted waste since November 8, 1987, or has additional capacity for waste deposition, and may include a bioreactor, and meets any one of three other criteria. One of these criteria defines a subject landfill as one that is a major source as defined in 40 CFR 63.2 of subpart A. Specifically, major source is defined as, "a stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants…."

As indicated in Table 1, the Landfill has the potential to emit less than 10 tons per year each individual hazardous air pollutant and less than 25 tons per year in combination of hazardous air pollutants. Based upon this information, the Landfill is NOT subject to the Landfill NESHAP.

8.0 COMPLIANCE ASSURANCE MONITORING (CAM)

On October 22, 1997, EPA promulgated the Compliance Assurance Monitoring rule (Title 40 Code of Federal Regulations Part 64). This Rule requires specialized pollutant-specific monitoring for those emission units which meet the following criteria:

8.1 The unit is located at a Title V Air Operating Permit source

8.2 The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt.

8.3 The unit uses a control device to achieve compliance with any such emission limitation or standard; and

8.4 The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as an Air Operating Permit source.

CAM has been identified as an <u>in</u>applicable requirement for the Landfill, based upon NMOC and H_2S emission standards/limits on the flare.

9.0 INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

Insignificant emission units are those units which are regulatorily exempt from some AOP requirements. While the insignificant emission units listed below are subject to the generally applicable requirements specified in Column 1 of Section 5.1 of the AOP, the permittee is not required to perform testing, monitoring, recordkeeping, or reporting for these units and activities, unless specified by Ecology. Ecology has not required any testing, monitoring, recordkeeping, or reporting for these units. The permittee may

certify continuous compliance, for these units and activities, if there were no observed, documented, or known instance of noncompliance during the reporting period. The permit shield, permit proviso 1.1, does not apply to any insignificant emission unit or activity. The following units and activities have been identified, by the permittee, as insignificant:

Emissions generated by haul trucks are insignificant on the basis that they generate only fugitive emissions [WAC 173-401-530(1)(d), 5/7/94]

Emissions from the evaporation pond and the cold cleaner are insignificant on the basis of their potential to emit. [WAC 173-401-530(4)(d), 5/7/94]

Units or activities which qualify as insignificant solely on the basis of their potential-to-emit may not exceed the emission thresholds of Table 2, unless the AOP is first modified.

Table 2. Insignificant Emissions Units Thresholds. [WAC 173-401-530(4)]

TSP	PM_{10}	VOC	CO	SO_2	NO_X	Lead
0.5 tpy	0.75 tpy	2 tpy	5 tpy	2 tpy	2 tpy	0.005 tpy

10.0 GAPFILLING

Section 5 of the air operating permit identifies requirements that are applicable to existing emission units at the source. The air operating permit must contain emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. Where the applicable requirement does not require periodic testing or monitoring, periodic monitoring sufficient to yield reliable data has been identified and included in the permit. This action is termed gapfilling.

The last column of the tables in section 5, contain the monitoring, recordkeeping, and reporting to be performed by the permittee (MRR). This column identifies the periodic action that must be taken to demonstrate compliance with the applicable requirement. It should be noted that in addition to the MRR a source must consider all other credible evidence when certifying to their compliance status.

For some applicable requirements no action is warranted and instead the permittee will annually certify their compliance status. These requirements are identified with, "no additional monitoring required," stated in the MRR column.

Many applicable requirements specified periodic MRR while gapfilling was used for the remainder. The source of the MRR is identified in brackets for each MRR requirement. Those that reference WAC 173-401-615(1) were gapfilled. Below is a brief explanation of the basis for each instance of gapfilling.

Table 3. Identification and basis of “gapfilled” items.

Applicable Requirement(s)	Gapfilling basis
5.1.4, 5.1.5, 5.1.6, 5.1.7, 5.1.9	This source has not had a history of violating these "nuisance" requirements. Since these could be subjective, we determined it is appropriate to consider complaints in MRR.
5.2.19, 5.2.22, 5.3.1, 5.3.6, 5.3.11	Simple records, generally already kept, will be helpful in proving such operations.
5.1.3, 5.2.20, 5.4.16	This source has not had a history of visible emissions and is not expected to have problems complying with established visible emission standards. Monthly MRR is determined to be appropriate. Additionally, action is required when visible emissions are observed at times other than the monthly survey.
5.2.14, 5.2.15, 5.2.17	Development and implementation of these documents fulfill the applicable requirement. Periodic review/inspections will aid in assuring that the documents contents are being followed.

Those requirements that specify "no additional monitoring required" as the MRR, have been determined to require no specific monitoring. However, the responsible official will be required to certify the source's compliance status, with these requirements, at least annually.

11.0 STREAMLINING

This Air Operating Permit does not include any streamlined provisions.

12.0 COMPLIANCE CERTIFICATION

By virtue of the Air Operating Permit application and the issuance of this permit, the reporting frequency for compliance certification for this source shall be annual.

13.0 ENFORCEABILITY

Unless specifically designated otherwise, all terms and conditions of the Air Operating Permit, including any provisions designed to limit the source's potential to emit, are enforceable by EPA, and citizens, under the Federal Clean Air Act. Those terms and conditions which are designated as state-only enforceable, as indicated by (S), are enforceable only by Ecology. It should be noted that state-only terms and conditions will become federally enforceable upon approval of the requirement in the State Implementation Plan. However, the enforceability of the terms and conditions of this Air Operating Permit are not expected to change during the Permit term. All terms and conditions of the Air Operating Permit are enforceable by Ecology.

Following is an example of how to identify a state-only enforceable condition. At the end of Condition 2.7.2 the following notation occurred: "[WAC 173-400-107(3), 8/20/93, 7/11/02 (S)]." If a version of the regulation is cited with no reference to enforceability, it is federally enforceable. Thus, this notation means that the authority for this permit condition is contained in the 8/20/93 version of WAC 173-400-107 (this is the version of WAC 173-400-107 that is in the SIP and is federally enforceable) and in the 7/11/02 version of WAC 173-400-107. The (S) after 7/11/02 means that the 7/11/02 version of WAC 173-400-107 is State-only enforceable.

14.0 OPERATIONAL FLEXIBILITY

The permittee did not request or specify any alternative operating scenarios.

In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. (ex., A monthly visible emission survey <u>is not</u> required if the emission unit is not operated during the month that the survey covers. A monthly visible emission survey <u>is</u> required if the emission unit is operated for any portion of the month that the survey covers.) Recordkeeping and reporting must note the reason why, and length of time, the emission unit was not operated.

15.0 OTHER PERMITTING ISSUES

15.1 STATE AMBIENT AIR QUALITY STANDARDS. The following regulations are ambient air quality standards that apply generally to all areas of the state. There are no on-going monitoring, recordkeeping, or reporting requirements specific to the source to prove compliance with the ambient air quality standards. Compliance with the ambient air quality standards is required, and the following regulations are triggered for any source when undergoing New Source Review for Notice of Construction or Prevention of Significant Deterioration permitting and are generally reported in the permits as findings as required, or when an actual or suspected violation of an ambient air quality standard is found locally.

WAC 173-470-010, -020, -030, -100, -160, 1/3/89
WAC 173-470-110, -150, 1/3/89 (S)
WAC 173-474, 9/30/87 (S)
WAC 173-475, 2/29/80 (S)

(S) means state only requirement

16.0 COMPLIANCE SUMMARY

16.1 NOTICE OF VIOLATION NO. 1732

On October 18, 2004, Ecology issued Notice of Violation (NOV) No. 1732, to Waste Management for air quality violations at the Greater Wenatchee Regional Landfill, occurring prior to August 17, 2004. The violations cited included permitting, recordkeeping, monitoring, and reporting requirement violations. Most notably, Ecology alleged that Waste Management operated a portable crusher on-site without obtaining the required air quality permits. NOV No. 1732 was resolved by pre-penalty Settlement Agreement and Agreed Order No. 2035, effective March 28, 2005. In the Settlement, Waste Management neither admitted nor denied the alleged violations, and made a payment of $8,500, to the Air Pollution Control Account.

16.2 OTHER REPORTED VIOLATIONS

The permittee has submitted annual *Compliance Certifications*, required by AOP condition 4.3. In the *Compliance Certifications*, the permittee has stated their compliance status with respect to each permit term and condition. The permittee has reported some violations of permit terms and conditions. Generally, these violations have not been categorized as “high priority” and thus the most recent ones have not resulted in formal enforcement action. The *Compliance Certifications* are available for review at the Department of Ecology’s Central Regional Office, located in Yakima, Washington. Interested persons may make an appointment to view these documents by calling (509) 575-2490 and asking for the public records disclosure coordinator.